

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

)	
ANGELA FULLER, on behalf of herself and)	
all others similarly situated,)	Case No. 2:15-cv-03856-KM-MAH
)	
Plaintiff,)	CLASS ACTION
v.)	
)	NOTICE OF PLAINTIFF'S
AVIS BUDGET CAR RENTAL, LLC, and)	UNOPPOSED MOTION FOR
AVIS BUDGET GROUP, INC.,)	PRELIMINARY APPROVAL OF
)	CLASS SETTLEMENT
Defendants.)	
)	Motion Date: April 17, 2017

PLEASE TAKE NOTICE that on April 17, 2017, Plaintiff, by her undersigned counsel, will appear before the Honorable Michael A. Hammer, U.S.M.J., and move pursuant to Fed R. Civ. P. 23(e) for this Court to preliminarily approve a settlement of this class action between Plaintiff, on behalf of the Certified Class, and Defendants Avis Budget Car Rental, LLC and Avis Budget Group, Inc. (collectively “Defendants”). In addition to the attached Memorandum of Law in Support of Plaintiff’s Unopposed Motion for Preliminary Approval of Class Settlement, Plaintiff states:

1. On November 17, 2016, the parties reached a final agreement to settle this action, subject to reduction to, and execution of, a final settlement agreement. The parties have since executed a written settlement agreement, a copy of which is an exhibit to the attached memorandum. The settlement agreement is fair, reasonable and adequate.

2. Plaintiff requests that this Court preliminarily approve the Settlement Agreement, and enter a Preliminary Approval Order.

3. Plaintiff also requests this Court schedule a Final Approval Hearing at which the Court will consider: (a) whether the Settlement should be finally approved as fair, reasonable and

adequate for the Class, including any timely objections thereto; (b) whether the Judgment granting approval of the Settlement and dismissing the Class Action with prejudice should be entered; (c) whether Class Counsel's application for attorneys' fees and costs should be granted, and (d) whether Class Counsel's application for Service Award to Plaintiff will be granted.

4. Counsel for Defendants have reviewed this Motion, and Defendants do not oppose this Motion or the relief sought.

DATE: March 14, 2017

FRANCIS & MAILMAN, P.C.

By: /s/ John Soumilas

James A. Francis
John Soumilas
Lauren KW Brennan
100 S. Broad Street, Suite 1902
Philadelphia, PA 19110
T: 215-735-8600

Micah S. Adkins (*pro hac vice*)
THE ADKINS FIRM, P.C.
2 Perimeter Park South
Suite 405 E
Birmingham, AL 35243
T: 205-458-1204

Robert S. Sola (*pro hac vice*)
ROBERT S. SOLA, P.C.
1500 SW First Avenue
Suite 800
Portland OR 97201
T: 503-295-6880

Attorneys for Plaintiff and the Classes

CERTIFICATE OF SERVICE

I hereby certify that on this day, a true and correct copy of the foregoing has been filed electronically and is available for viewing and downloading from the federal courts' Electronic Cases Files system. A copy of the foregoing has been served on counsel of record via the ECF system.

DATE: March 14, 2017

/s/ John Soumilas
John Soumilas